

PROPOSED FINAL STATEMENT OF REASONS

PROPOSED AMENDMENTS TO THE CONFLICT OF INTEREST CODE FOR THE FAIR POLITICAL PRACTICES COMMISSION

Executive Office Positions

Information Officer II

This title is being changed to “Communications Director”.

The disclosure category for this position has been changed (augmented) from Categories 3 & 6 to Category 1 because the person in this position, as part of the Executive Staff, consults with and directly advises the Chairman of the Commission and exercises broad and undefinable duties. The person in this position participates in major policy decisionmaking, including the crafting and promulgation of regulatory policy and, potentially, the purchase of technological products and services and legal services for the agency.

Legislative Coordinator

This title is being changed to “Government Affairs Director”.

Associate Information Systems Analyst

This position is being eliminated from the Executive Division and will now become a subset of the designation “All Information Technology Staff . . .” under the Administration Division.

Political Reform Consultant

This position is being eliminated from the Executive Division.

Enforcement Division Positions

FPPC Counsel, Enforcement Division

The disclosure category for this position is being changed (augmented) from Categories 2 & 7 to Category 1 to reflect the role a person in this position is expected to play in crafting regulatory and other substantive, agency-wide policies.

Associate Government Program Analyst

This title is being changed to “Staff Services Analyst / Associate Governmental Program Analyst”.

Administration Division Positions

Data Processing Manager I

This title is being changed to “Chief Information Officer”.

This position’s disclosure categories are being changed from “4, 5” to “4” because

Category 5 is generally a subset of Category 4 and, therefore, redundant.

All Information Technology Staff, other than Chief Information Officer, at or above the position of Associate Information Systems Analyst

This group designation is being added and is subject to reporting under Category 5.

The disclosure category for this position is meant to reflect the role the information technology people in these positions are expected to play as subordinates to the senior information and technology employee for the agency, yet who make, or participate in making, decisions about information technology purchases that could affect a financial interest.

Associate Personnel Analyst

This position's disclosure categories are being changed from "4, 6" to "4" because Category 6 is generally a subset of Category 4 and, therefore, redundant.

Budget Officer

This position is being added and is subject to reporting under Category 4.

The disclosure category for this position is meant to reflect the role a person in this position is expected to play in choosing what goods and services the agency uses in most aspects of its administration, including technology and legal services.

Category Amendments

Categories 2 & 3

The suggested amendments are not substantive. They are meant to clarify the types of attorneys about which designated employees must disclose information.

Categories 6 & 7

The proposed amendments eliminate the Categories 6 and 7. The reason for eliminating these categories is because they are subsets of, and therefore partially redundant of, Category 4.